

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CYNTISHA STEWART, <i>et al.</i>,)	
)	
Plaintiffs,)	Civil Action No. 3:20-cv-00903-JAG
)	
v.)	Hon. John A. Gibney, Jr.
)	
LEXISNEXIS RISK DATA RETRIEVAL)	
SERVICES, LLC a/k/a LexisNexis Risk Data)	
Management, Inc., <i>et al.</i>,)	
)	
Defendants.)	

**DEFENDANTS LEXISNEXIS RISK DATA MANAGEMENT INC. AND LEXISNEXIS
RISK SOLUTIONS INC.’S PARTIAL MOTION TO
DISMISS PLAINTIFF’S CLASS ACTION COMPLAINT**

Defendants LexisNexis Risk Data Management Inc. (“LNRDM”) and LexisNexis Risk Solutions Inc. (collectively, “Defendants”), pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully move this Court to dismiss the putative class claims under 15 U.S.C. §§ 1681c(a) (Claim 1) and 1681e(b) (Claim 3) in the Class Action Complaint filed by Plaintiffs Cyntisha Stewart, Terry Brown, Eduardo Cantizzano, and Lisa Hill-Green. In addition, LNRDM respectfully moves this Court to dismiss Plaintiff Cantizzano’s putative class claim under 15 U.S.C. § 1681e(b) (Claim 2) as it relates to LNRDM. The reasons in support of the motion are set forth in the accompanying memorandum in support, which is incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court dismiss the identified claims in the Complaint with prejudice.

Dated: May 7, 2021

LEXISNEXIS RISK SOLUTIONS INC.;
LEXISNEXIS RISK DATA MANAGEMENT
INC.

By: /s/ Julie D. Hoffmeister

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